Conducting a corruption-oriented situation analysis for conservation work: Guidance from experience

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A corruption-oriented situation analysis can help conservation and natural resource management (NRM) practitioners understand and respond to the threats that corruption poses to conservation and NRM outcomes. As part of the Targeting Natural Resource Corruption (TNRC) project, WWF teams in different countries conducted situation analyses to inform both small-scale pilot projects and large-scale investments, in each case aiming to get a better idea of the ways that corruption may impact NRM activities and how they could design projects that would respond more effectively to those threats. Part I of this guide collects lessons from their experience and provides insights on implementing this type of analysis. Part II shares three case studies and analysis tools for doing corruption-oriented situation analysis.

Part I: Lessons from conducting corruption-oriented situation analysis

Why should conservation practitioners consider a corruption-oriented situation analysis?

Among the many steps needed for project design and startup, what are the benefits of a corruption-oriented analysis? Is it worth the time, resources, and effort? Interviews and reports from TNRC teams who ventured into this work reveal four key benefits.[1]

» Overall, teams improved their **understanding of the problem**. For example, one team seeking to increase public participation in an opaque spatial planning process reported that their situation analysis enhanced their comprehension of the legal framework and the specific process phases and requirements. This new knowledge led them to identify distinct stages where citizens' participation could be promoted.

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[1] The author reviewed eight situation analyses and interviewed 12 NRM practitioners from WWF offices in seven different countries.

» Learning more about the problem may confirm that the project and theory of change were formulated correctly, providing confidence for implementation or helping teams prioritize or adjust specific areas of work. Or it might change the scope or direction of the project if the new insights lead the team to rethink the theory of change. For instance, one team's findings on gender helped them redesign their educational activities to specifically focus on women and children.

» A situation analysis can also **clarify what is locally perceived as corruption**. For example, one team was able to identify that certain acts of corruption had been normalized and were socially and culturally accepted and therefore not necessarily seen as corruption. Another team was able to determine that although certain actions were not legally defined as corruption, stakeholders perceived it as such. This identification of social and cultural norms and local perceptions of corruption helps avoid mis-targeted activities and messages, so it can be critical for planning effective initiatives to address corruption-related threats to conservation and NRM goals.

» Teams' **understanding of power relations** improved. Their analyses helped them identify who the real decision-makers were and refined their assessment of stakeholders who could drive change. This kind of exploration can reveal critical insights, like that the roles and responsibilities formally or legally outlined often differ from the reality of power dynamics and practices. For example, one team's analysis revealed significant differences between the results of previous political economy analyses for their geographic area and the specific dynamics of the illegal wildlife trade.

A better sense of these power relations allows practitioners to identify intervention points that may encounter less resistance from influential stakeholders, including those involved in

Key terms

» **Situation analysis**: Many forms of situation analysis exist, including some familiar forms used by conservation and NRM professionals that do not specifically focus on corruption. A corruption-oriented situation analysis is *any type of analysis that captures insights about corruption and the context in which corruption operates*. Some examples include corruption risk assessments, political economy/ecology analysis, or some types of stakeholder or value chain analysis. Analyses typically take the form of written reports, but they can also be done through workshops, a risk matrix or checklist, or another simplified format.

» **Corruption**: "*The abuse of entrusted power for private gain.*" Corruption may look like bribes, embezzlement, extortion, nepotism, state capture, conflicts of interest, omitting duties, influence peddling, or trading favors. (Take the TNRC eCourse to learn more)

» **Corruption risk**: A corruption risk is a set of circumstances and vulnerabilities that may facilitate acts of corruption. Corruption risks may look like the absence of standardized processes, barriers to access information, barriers to participate in public decision making, unaccountable decision making processes, absence of controls, or other vulnerabilities.

» **Environmental crime**: Acts that damage the environment and are unlawful or contrary to law. Common examples include poaching, illegal logging, illegal mining, or smuggling. Corruption facilitates many environmental crimes, but the crime and the corrupt action may be separate problems with different driving and facilitating factors, requiring different responses.

corruption, and to adapt interventions over the course of the project. In some cases, this may be a more strategic approach than taking on more difficult problems immediately, and over time, small gains may build enough momentum to encourage future efforts targeting more challenging corruption-based drivers of environmental harm.

» Lastly, all teams reported a **shift in their own mindset** about the topic of corruption. At the beginning, some teams were skeptical about the relevance or utility of this type of study, while others perceived a high risk of getting "stained" by association with anti-corruption discussions and issues. After exploring the corruption that affected their objectives in more detail, all teams reported being more comfortable and willing to incorporate anti-corruption perspectives and activities in their work. They shared that corruption now feels less daunting and intimidating, and the relevance of corruption and anti-corruption is clearer. This change has contributed to teams taking a more systematic approach to corruption by including this line of work in other projects.

How can conservation practitioners define the "scope" of a corruption situation analysis?

While the benefits of doing corruption-oriented situation analysis are clear, it can still be difficult to know how to frame the effort effectively, especially where to focus and how deep to go. Identifying the scope of analysis can happen at different stages, and not all studies are initially formulated with their scope fully defined or narrowed down, and **not all studies need to be the same in this regard**. At times, the scope gets refined as the study progresses. Experience from TNRC indicates that small-scale, short-term, more focused projects with less available funds may start with a narrower scope. In contrast, larger-scale, longer-term projects

with more available funds and multiple lines of work may involve a larger, more iterative process.

For example, a small-scale project concerned with the increase in illegal jaguar trade in Latin America conducted a situation analysis to understand if, in a specific geography of environmental significance, corruption was facilitating jaguar poaching or trade. In contrast, another team with a larger-scale project initially focused on understanding corruption in the broad context of illegal wildlife trade as a whole, which had been identified as a prevalent problem in their country. As the project evolved, the team progressively narrowed their scope to focus on the role of corruption in the trafficking of tortoises and precious wood, more specifically to their supply chains and certain geographical areas, and finally to the critical intervention points of customs and criminal procedures to determine the actual scope of specific project activities. Regardless of how and when the scope is narrowed, it almost always **starts from broadly-defined challenges** (like "we need better enforcement of laws against illegal logging") and becomes **more relevant and useful** as it focuses down to a specific problem or issue (such as the specific laws that are being violated and how corruption facilitates or drives those violations).[2]

To facilitate this task of narrowing the scope, here are some (non-exhaustive) suggestions.

» Break down a macro-problem into sub-problems. For instance, when thinking about how corruption may play a role in climate change, the scope could be narrowed down to focus on carbon emitters. The issue could then be disaggregated into key contributing sectors (e.g., transportation, manufacturing, oil and gas, energy, etc.). Choosing one of these (e.g., transportation) may align with the organization's strategic goals or partnerships, and that sector could be further disaggregated (e.g., air, maritime, or road transportation).

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[2] Other examples: understanding where corruption affects a key legal process, identifying the corruption-related drivers and facilitating factors for a specific environmental crime or harm, identifying corruption risks in a key public function, or simply testing assumptions and hypotheses necessary for programming objectives.

» Other options for disaggregating and narrowing the scope could start with a critical process (e.g., granting fishing permits), a specific supply chain (e.g., rosewood timber), an important geography (e.g., a particular protected area), and/or a key partner (e.g., a wildlife management agency).

» It may also be helpful to consider the legal status of the problem – is it a legal activity possibly permeated by corruption (e.g., fishing permits, community forest governance mechanisms) or an illegal activity (e.g., jaguar poaching) possibly facilitated or driven by corruption?

- If focusing on an *illegal* activity, the analysis may need to consider legal processes (e.g., permits, criminal procedures, administrative sanctions, etc.) while also evaluating other aspects where corruption might have clear interactions with petty crime or organized criminal networks (e.g., routes, underground markets, smuggling practices, checkpoints, illegal infrastructure such as roads, etc.).

- If focusing on *legal* activities, teams may need to focus on the details of the legal processes and identify where a legal activity may be more vulnerable to being permeated by illegal products or corrupt or illegal actions. Corrupt or illicit actors may hide behind legal façades.

The most suitable type of analysis and method of conducting it can be determined once the research questions are identified (see some examples from reviewed situation analyses in **Box 1**). Regardless of the chosen method, **local teams are free to adjust and label the analysis as they see fit**. For example, a "corruption risk assessment" can be adapted and labeled as an assessment of "vulnerabilities," "integrity," etc.

Suggestions for implementing a corruption-oriented situation analysis

1. Identifying stakeholders

A situation analysis necessarily relies on talking to people. Some methods and questions involve a higher degree of stakeholder engagement than others, like researching drivers for illegal logging versus analyzing published legal frameworks. In every case, however, fully understanding the problem requires learning from the people who have a stake in it. **Identifying and contacting the right range of stakeholders is essential for successfully diagnosing problems and formulating appropriate and feasible responses**.

Identifying key stakeholders also helps with implementing the analysis. For example, it can help to (i) determine the scope of workshops, questions, or topics that can be discussed; (ii) assess the feasibility of certain activities; (iii) indicate who the most trustworthy stakeholders are and who can provide more sensitive information; and (iv) determine the profile of any consultants or advisors needed.

So, how to identify the stakeholders? Most importantly, start by asking a few questions:

» Who are the people or organizations that might know more details about the problem? What institutions/individuals work on these topics? Which organizations have previously worked on this matter?

» What government or non-governmental entities might be in more direct contact with the problem?

» Who can provide an overall orientation to the issue(s) we're concerned about and help us understand the corruption drivers and facilitating factors involved?

» Who is likely to be affected positively or negatively by efforts to change these corruption dynamics?

» Who will both want and be able to support our objectives? Who might oppose them?

Questions like these might render a list of roles or groups rather than individuals. But from this starting list, other considerations can be used to target individuals and choose techniques for selecting interviewees, focus group members, or survey recipients. Some helpful ways of thinking about selection and mapping of stakeholders include:

» Location (e.g., stakeholders located in the geographical area prioritized by the analysis);

» Type of work and perspective on the problem (e.g., conservation organizations, anti-corruption experts or activists, journalists, officials, private sector actors, etc.);

» Level of trust (e.g., groups of local stakeholders with whom the consultant or team has previous relationships); or

» Level of influence on the subject matter (e.g., environmental authorities, Ministries of Environment, etc.).

Whatever the criteria used, **it is critical to have representation from multiple levels and constituencies**. For example, stakeholder maps may be tested by identifying if there are local, regional/departmental, and national representatives, if there are likely opponents and supporters, or if there are representatives likely to have conflicting interests (e.g., Indigenous Peoples, local communities, civil society, private sector, government officials). Teams that lacked representation of one of these groups reported it as a gap in their analysis.

Finally, remember that stakeholder selection and mapping is not necessarily a single process completed at a single point of time, and initial gaps can be filled as the work progresses. For example, the "snowballing" technique involves asking each interviewee if they have suggestions of other important stakeholders. Such questions can also be formulated to solicit ideas on specific groups that are under-represented in early mapping and selection exercises.

2. What questions to ask and how to talk about the "C" word

After identifying the right stakeholders, addressing the most relevant topics and questions is a significant component of a situation analysis. Topics and questions should derive directly from the research questions and should **start from a good mapping and characterizing of the problem**. For example, many teams focused on mapping legal processes and supply chains, which determined the topics discussed or asked in workshops, trainings, interviews, and surveys. In many of these cases, teams asked specific questions about the procedures or legal requirements, which opened the discussions about corruption (see examples in **Box 2**).

Interview guides, questionnaires, and other discussion guides should also reflect a clear understanding of the **differences between corruption, corruption risks, and illegal acts** (see "Key Concepts" on page 1). Because "corruption"

can be understood in many different ways, it is important to check understandings early, even if just by asking "what do you think of when you hear 'corruption' in regard to [wildlife trafficking, illegal logging, unreported fishing, etc.]?" Then, conversations or surveys can clarify the types of corrupt actions, corruption risks, or illegality of greatest concern for the analysis, as well as the specific drivers and facilitators for each. The differences between these concepts are also crucial when asking follow-up questions to stakeholders that tend to discuss many other topics.

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Box 2. Identifying relevant questions

One team exploring corruption linked to illegal gold mining focused most of its questions on understanding how criminal networks were able to falsely register individuals as artisanal gold miners.

Another team assessing how corruption could facilitate jaguar poaching and illegal trade focused most of its questions on specific law enforcement procedures (e.g., granting hunting permits, law enforcement checkpoints on transit roads, rangers' activities and abilities to sanction), where corruption could create gaps that facilitated illegal activity.

Similarly, a team analyzing how corruption affected permitting in fisheries asked interviewees "*what is the process you follow to obtain the [x] permit?*". This question led interviewees to explain how corruption operates in obtaining permits.

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Not all questions or topics need to be discussed equally with all stakeholders. Questions should be formulated considering many factors, like literacy levels, cultural background, gender considerations, the role of the stakeholder, and geographical knowledge of the stakeholder. For example, it may be possible to openly talk about "illegal mining" with a member of a conservation NGO, but it may not be advisable to label it as "illegal" when talking

to one of the miners who may not consider what they are doing as such. Similarly, a legal process can be discussed in formal ways and technical language with government officials, while it may have to be approached differently when talking with a local community member who lacks technical knowledge. If time permits, a helpful approach is to pilot questions with stakeholders before collecting data. A pilot can help calibrate whether the questions suit the audience and contribute to answering the research questions. Piloting questions is especially useful for surveys where live follow-up clarifications are not possible.

Ultimately, remember that many stakeholders will be willing to discuss widely known circumstances or open secrets openly, but few will be ready to go into the depths of very sensitive information. The key is grasping the opportunity and going into deeper conversations with the stakeholders who seem more willing to share sensitive information. However, in any case where sensitive or risky information may be discussed, it is important for researchers to **clearly assess what information needs to be collected and avoid delving into topics that are not essential to the research**. For example, in a case where corruption in illegal wildlife trade had some remote links with drug trafficking, the latter topic was purposefully avoided to guarantee the safety of the research team.

In most cases, a situation analysis seeks information to understand the types of corruption that may affect a given objective, and how corruption and power dynamics work. Obtaining a few culprits' names is typically not the goal, and setting out to gather such information can jeopardize opportunities to learn more about the broader issues a project seeks to address. It can also be dangerous for researchers and respondents. **Typically, researchers should indicate that the analysis is not intended to identify culprits and is not part of a law enforcement investigation**.

Talking about the "c" word can be challenging for some stakeholders, so **explicit references**

to corruption should be carefully made, and alternatives exist. Certain stakeholders may not feel frightened or threatened when directly asked about corruption (e.g., scholars), while others may find it more challenging (e.g., government officials, local communities). Teams reported some valuable lessons to avoid intimidating or offending a stakeholder, from using alternate words such as "vulnerability," "integrity," or 'transparency," to discussing how to enhance good practices or good governance. Another helpful tip is to use the exact same word the stakeholder uses to describe an act of corruption or a corruption risk. Hence, if they explicitly mention the word "corruption," this can be a cue that the term can be used.

3. Other considerations for collecting information and engaging stakeholders

» **Safety.** In general, local stakeholders tend to be very familiar with security risks and are therefore crucial in providing information on how to mitigate them. Teams mentioned that a helpful way of assessing security risks was to identify if a specific subject of study is more sensitive than others and therefore requires further safety measures (e.g., researching illegal fishing was considered more dangerous than researching illegal logging in a particular country).

A security protocol is strongly suggested. It can provide detailed information on all research staff and keep track of their whereabouts and planned movements (e.g., check-in schedules, routes, hotels, people accompanying team members, and emergency contact numbers). Such a tool can also provide guidance on how to respond to threats or demands for bribes or any specific risks that the researchers have previously identified.

Safety considerations should apply not only to the researchers but also to the participants. For example, some teams highlighted the importance of diluting risk for individual

community members by talking to more than one person per community. More considerations on the types of risks and how to address them can be found [here](#).

» **Confidentiality.** Before collecting data, teams should determine how to guarantee confidentiality to participants. While specific measures will vary depending on the methodology and the specific context, the general rule is to protect participants' data adequately. A protocol for data collection and management can include, for example, collecting information in compliance with *habeas data* laws, erasing recordings at the end of the study, anonymizing participants' information, and limiting the number of people who can access the data. Any such measures should be explained and assured to all respondents at the beginning of their participation. For example, some teams who conducted interviews used mechanisms such as coding the stakeholders' names, talking to people in safe places, and conducting interviews individually to mitigate potential eavesdropping.

Teams also mentioned the importance of using informed consent forms. Clear rules on how their information would be used provided confidence to interviewees and other respondents. One team noted that they needed to adjust the language of the consent forms according to the stakeholders; they specifically designed a consent form with a simplified language for local communities.

» **The importance of fieldwork.** When possible, undertake fieldwork rather than conducting research through virtual means. Fieldwork allows a constant flow of information even when you are not engaged in interviews, workshops, or focus groups (e.g., being aware of the landscape, ways of living, social dynamics, or infrastructure developments). If virtual work is the only available option, the team should include people who know the

geographical areas, the local dynamics, and the socio-economic and cultural nuances of the location(s). When fieldwork cannot be included, plan ways to reach the field during project implementation to check progress and assumptions.

» **Gender and cultural considerations.** Assess whether stakeholders may be more willing to discuss corruption and environmental matters with men or women. This [toolkit](#) can provide some examples of gender considerations in the context of illegal wildlife trade, and [this TNRC resource](#) identifies some specific ways that a gender lens can help understand the impact and dynamics of corruption. From a practical point of view, one TNRC team reported that in their specific context, having women researchers was vital in making men feel more comfortable when talking about illegal acts.

Cultural considerations are also vital for ensuring that the information collected is an accurate representation of reality. Teams should discuss beforehand any cultural aspects that may affect or facilitate doing the analysis. For example, teams should account for stakeholders who may tend to avoid saying no, those who may want to avoid engaging in group discussions, or those who may want to avoid contradicting elders or superiors.

» **Pairing knowledge.** The TNRC teams reported two important types of pairing while conducting a situation analysis: (i) with other local organizations or local community leaders and (ii) between team members or between the local team and the consultant(s). Working with local organizations or local community leaders was essential for reaching local communities and specific stakeholders in almost all cases, but especially when teams did not have a strong presence in all the analyzed geographical areas.

As for pairing knowledge with other team members or consultants, the teams highlighted that combining skills, such as having someone

with conservation expertise on the ground (e.g., a WWF staff person) and someone with an anti-corruption or governance background, proved successful. Such collaboration should be used when framing the analysis and determining its methodology, as well as for implementation. In one case, the TNRC team could not work closely with the consultant team to frame and implement the analysis, and their reported results were not as successful.

» **Timing.** NRM practitioners should consider context-specific circumstances that can impact the implementation of the analysis (e.g., avoiding launching activities during holidays, wildfire season, rainy season, etc.). Political, economic, or social circumstances that can facilitate the work or present roadblocks should also be taken into account. For example, a team reported that the media had been raising awareness on the research topic during the implementation of their situation analysis, which facilitated the local team's engagement with stakeholders. Another team reported that when they shared findings with the government, there was a particular willingness to address corruption, which facilitated bringing some of the recommendations to life. While the circumstances in these examples were unplanned, teams are encouraged to be on the lookout for this kind of opportunity when planning the analysis and as its implementation evolves.

» **Organizational roles, relationships, and communications guidelines.** Make sure that the consultant or the team working on the analysis understands the roles, relationships, and communication guidelines of funding and/or implementing organizations in the country/geographical area. The consultant or team should agree on communication protocols and act per these guidelines when communicating about the analysis or publishing reports, for example, to avoid damaging relationships or creating other unexpected risks.

Making sense of the information: Findings and recommendations

1. Evaluating information gathered

Once data has been collected, teams have to make sense of it. This section will focus on useful tips to make sense of collected information. These tips in no way substitute for formal methodologies; they rather serve as a complement.

During the conduct of the analysis, constantly remind yourself about the scope. **Ask yourself if the information that is being collected answers your research questions and if it changes or confirms your assumptions**. Sometimes gathered information can point to new avenues that were not foreseen when the analysis was designed, and this is the time to decide if it is worth pursuing them further.

A practical tip is to **allocate specific times for pausing and reflecting**. Such discussions, either with other team members or with the consultant, may be guided by a set of questions but should allow room for open conversations. Examples of the questions teams may want to ask themselves include:

» How does the collected information change or confirm our understanding of the problem? Is there new information on the problem?

» What power relations are we unveiling?

» Have we identified new stakeholders that we did not know played a role in the problem?

» Which stakeholders can be key in driving change? Which ones may oppose our goals or feel threatened by our objectives?

» Who can be a strategic ally for implementing activities?

» Are there any special opportunities to take advantage of? What is currently important to public authorities? Do other stakeholders have a particular reason to act now?

» Are there any low-hanging fruits for change? Which changes are more challenging and resource intensive?

2. Formulating and validating recommendations

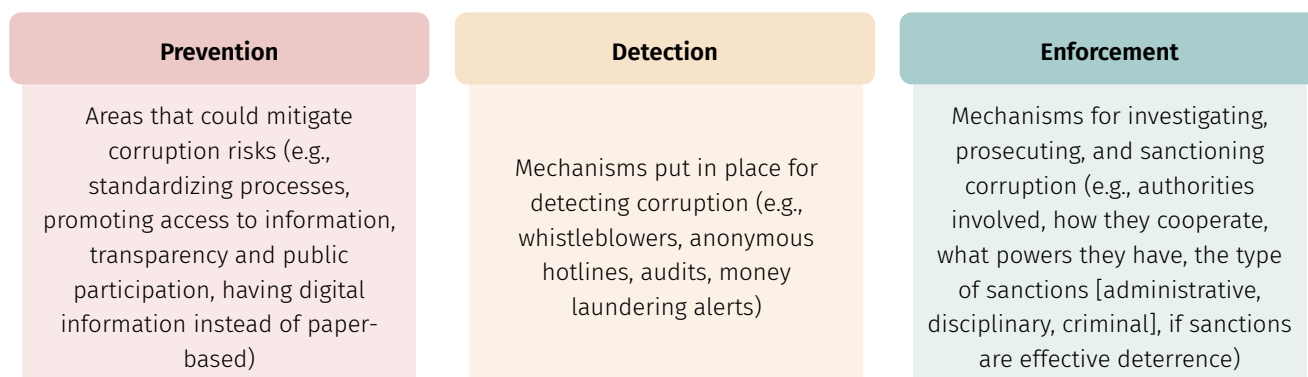These reflections can also be a good start for **thinking about how to formulate recommendations**. To identify recommendations, teams may start by setting a general principle that not everything can be done and establishing the criteria that will guide the formulation of their recommendations (e.g., feasibility, targeting higher risks, targeting greatest impact). Other useful tips for developing and organizing recommendations are to:

» Identify those that your organization can implement (e.g., can be included in ongoing projects, and the organization has the resources and capacities),

» Be clear about the geographical scope (e.g., of authority required, scale of implementation),

» Consider who can implement them, and

» Think about which aspects of anti-corruption work could be addressed with the recommendations (See **Figure 1** and this toolbox).

The TNRC teams also reported that framing their recommendations within already existing public policy or civil society initiatives proved to be helpful in increasing their likelihood of becoming a reality.

Once the results have been identified and the

Figure 1. Anti-corruption approaches

Prevention	Detection	Enforcement
Areas that could mitigate corruption risks (e.g., standardizing processes, promoting access to information, transparency and public participation, having digital information instead of paper-based)	Mechanisms put in place for detecting corruption (e.g., whistleblowers, anonymous hotlines, audits, money laundering alerts)	Mechanisms for investigating, prosecuting, and sanctioning corruption (e.g., authorities involved, how they cooperate, what powers they have, the type of sanctions [administrative, disciplinary, criminal], if sanctions are effective deterrence)

recommendations have been formulated, go back to the stakeholders who have contributed to the analysis before sharing results. TNRC teams reported that it was vital to **validate the findings and recommendations with local and national stakeholders and across sectors** (e.g., NGOs, the private sector, and local communities). These validation sessions can clarify the findings, help assess the feasibility of the recommendations, and help refine the required steps to implement them.

3. Sharing recommendations

Sharing the results and recommendations of situation analyses is essential. This is the stage where teams can voice their findings and set in motion the changes they have identified. Several considerations are important as teams plan how and when to share their findings.

First, discuss **if and how findings and recommendations should be publicized** and how to share the results with relevant stakeholders. It is most helpful to have this discussion *before* the analysis is started. Teams may want to discuss **how sensitive information should be treated** in any outputs and determine a planned course of action. The TNRC teams reported that sharing "raw" findings and recommendations without carefully adjusting the language could have been detrimental to the organization's relationship with specific stakeholders like the government or civil society partner organizations. Some teams also discussed how to handle sensitive information

about the participants and researchers in any public documents to guarantee their safety (e.g., avoiding specific mentions of geographical areas, coding participants' names, and avoiding mentions of the institutions to which they belong). As a result, some teams shared edited versions and kept the original report for internal use only, so this additional phase needs to be planned for from the beginning.

Second, reports and findings should be drafted with "impact" in mind. Although the analyses covered in this document were intended to explore the environmental impacts of corruption, the actual impacts tended to be under-represented in final reports. Teams should use analysis outputs to **highlight how specific acts of corruption or corruption risks impact the environment**, especially the environmental objectives they are concerned with. Articulating these impacts makes it easier for target audiences to understand why addressing corruption and corruption risks is relevant for their work. TNRC teams also highlighted the importance of drafting recommendations using positive language and framing them as "opportunities for change" instead of focusing on what is not working. Lastly, teams should keep in mind that their audience may not be familiar with corruption or environmental matters; thus, language should be easily accessible to non-experts.

The aftermath: What to expect after completing a situation analysis?

» **Systematic approach.** Without necessarily intending to do so from the beginning, all TNRC teams that undertook a situation analysis have **incorporated a more systematic approach to corruption** across their programming. A corruption lens is now considered essential for other projects in the same office or for continued work in the main project for which the situation analysis was done. For example, one office identified that illegal wildlife trade, which was the main focus of their analysis, converges with illegal logging and timber trade. They now consider that a similar look into illegal timber could be useful to further clarify the power dynamics and corruption risks associated with illegal wildlife trade. Similarly, another team that focused on illegal wildlife and timber trade now considers that this type of work can also be useful to understand what is currently happening with illegal, unreported, and unregulated (IUU) fisheries in their country, particularly by expanding their analysis to customs.

» **Creating strategic alliances.** As part of the aftermath, teams who engage in a situation analysis can expect to forge **strong bonds of cooperation** with other organizations or the hired consultants. The TNRC teams reported that they not only strengthened relationships with local organizations who can promote anti-corruption work or who were of strategic help in the analysis, but they also have been able to connect to, or even establish, networks of people who are willing to engage in anti-corruption and conservation work. TNRC teams described these networks as a live body where stakeholders feel comfortable helping each other and where they often discuss and explore avenues of anti-corruption work.

» **Progressive learning.** Understanding how to conduct a situation analysis evolves.

Box 3. Documenting lessons learned

Discussions with the TNRC teams indicated that lessons about doing a situation analysis (as opposed to the recommendations of the analysis itself) tend to be relegated to regular project reporting, where the full scope of these lessons is not necessarily reflected. Thus, such lessons may only be known by the individuals that conducted the study and can get lost with staff turnover and changes in responsibilities. Though these lessons are very much alive for the team members in our case studies, there may be few specific spaces or documents designed to reflect on what went right or wrong and capture the changes in internal understandings or attitudes about corruption that resulted.

Collecting and documenting these lessons can be crucial in achieving a systematic approach to corruption in conservation programming. Teams should plan ahead to collect and document lessons at specific points in the process. Collecting lessons during the analysis implementation mitigates the risk of forgetting some, while doing so after completion allows teams to reflect in hindsight on what went right or wrong, especially in light of the ultimate findings. Regardless of when this reflection occurs, foster discussions rather than recording ideas individually. Group discussions help achieve a deeper and more comprehensive understanding of what was learned.

Lastly, teams are encouraged to think of ways to share those lessons so others can leverage their experience. Lessons can be shared in a variety of forms: through workshops, presentations, conferences, or summary documents. TNRC teams who had specific mechanisms to document lessons learned will be preparing manuals and guides for other NRM practitioners in the hopes of facilitating the task for those who have never engaged in this type of work.

Teams reported **feeling progressively more comfortable** with their knowledge of conducting a situation analysis and studying corruption. In hindsight, they were able to identify that at the beginning of the analysis, they did not fully understand what the work entailed, but they now know how to tackle this type of study. Some teams even reported that it felt like an unsurmountable task at the beginning, but they now feel confident and empowered to use situation analysis in other projects. Not knowing exactly how to do a situation analysis should not discourage teams from engaging in this type of work.

» **Situation analyses are not an end goal.** Situation analyses were perceived as a steppingstone for a more comprehensive understanding of corruption. Teams often mentioned that this analysis **provided a baseline understanding of the problem**, which kept evolving as they implemented the broader project. The activities and initiatives resulting from the situation analysis constantly nurtured their overall knowledge of corruption, power dynamics, and the problem itself.

» **Transfer of knowledge.** Teams highlighted that an essential component of the aftermath was the transfer of knowledge from the TNRC project, consultants, local partners, or other team members. Almost all teams mentioned the importance of being in close contact and discussing their approach with other NRM practitioners that had implemented this type of analysis before. Similarly, teams often noted that the aid from the TNRC project, through political economy training, workshops, or the [Knowledge Hub](#), helped them better understand what a situation analysis entailed.

Consultants and local partners were also critical providers of knowledge for local teams. For instance, a team reported having enhanced its understanding of the country's legal framework due to the knowledge shared by the organization that consulted for them. A successful transfer of knowledge empowers local teams to adopt a systematic approach to corruption, and it is strongly advisable to include it as part of the situation analysis contract or agreement. Teams can, for example, request capacity-building sessions from the consultants; one of the TNRC teams participated in training sessions led by the consultant on topics that ranged from basic anti-corruption concepts to techniques for conducting interviews.

» **Reliable partner identification.** An overarching, often non-written, result of a situation analysis is identifying individuals, entities, or institutions, including the people and organizations who partnered in the study, that can be reliable partners in doing anti-corruption work. A situation analysis process also allows teams to recognize any potential risk associated with engaging with specific persons or institutions and adopt decisions accordingly. For example, in one particular case, the local team identified that one of its implementing partners increased certain reputational risks by compromising participants' data and, therefore, should not be considered for future work on anti-corruption and conservation.

» **Strengthening the organization's bonds with government bodies.** All teams mentioned the importance of **avoiding a confrontational approach with government** when analyzing the impact of corruption on conservation goals. They noted the importance of casting a corruption analysis as an aspect of a strategic partnership with government to find opportunities for change rather than naming/shaming, finger-pointing, or confronting. This is particularly important when considering that, on many occasions, the results and recommendations from a situation analysis will have some components of policymaking or advocacy where the government is the natural partner.

A non-confrontational approach does not necessarily mean agreeing blindly with government policies, actions, or claims; nor does it preclude critical thinking about the appropriateness of partnering with government. Instead, a non-confrontational approach encourages teams to seek and evaluate the most promising avenues for achieving desired results. For example, an analysis might indicate that the executive branch wants to maintain the status quo, but it may also identify certain lawmakers or judges who are keen to make changes from a different angle. In this case, teams can avoid engaging in draining confrontations with the executive branch while targeting the issues more effectively through other officials.

» **Understanding what can or cannot be done.** After conducting a situation analysis, project teams and their collaborators may **feel overwhelmed** by the scope of corruption problems or feel that they don't have the capacity to address it. Nonetheless, a situation analysis can help organizations clarify whether corruption is a critical threat to their objectives, what the specific aspects of the threat look like, who may be involved in both the problems and the solutions, and the organization's particular role in doing or promoting anti-corruption work. It can also help NRM practitioners assess the feasibility of specific initiatives or activities. For example, one country office was able to identify that some local organizations with whom they planned to work had no capacity to engage in advocacy initiatives, meaning that they might need to turn to larger, more structured partner organizations.

» **Long endeavor.** A general observation from the TNRC teams is that driving change is a long-term effort. They acknowledged that, initially, implementing many of the recommendations from a situation analysis might not seem feasible or effective, especially in the short term. However, **prolonged work on anti-corruption** is what **can effectively drive change**. This means progressively adapting strategies to address the identified issues according to the specific context.

Teams also mentioned that while changing the entire system is an impossible task, they were able to identify achievable activities that can progressively drive change, and their analyses provided a framework for checking progress and adapting strategies. In this sense, one team mentioned that even if NRM practitioners cannot clearly identify the most powerful perpetrators of corruption, they should not be demotivated as "*there is always room to do something.*"

It is also worth noting that *frustration* can be a natural part of the aftermath. Many teams felt that they could have gotten more information on corruption or that there were other aspects to the problem that could have been explored. Some even felt unsure about how to use some of the information they gathered. Instead of considering these as a downside or failure, frustration can be a catalyst to identify new avenues of research or consultation for the local teams. Some teams may feel a strong desire to ask themselves how a specific problem, project, program, or initiative can be affected by corruption and what they can do about it. Frustration, in the end, is an invitation to incorporate a more systematic approach to corruption in conservation programming.

Lastly, how can teams know if their situation analysis work was successful? While it can be challenging to *measure* the results from a situation analysis, its success can be *identified*. If, in the aftermath, teams can better identify the ways corruption may affect their activities and objectives; or if the study changed their understanding of corruption, how it works, and the power relations that can drive or hinder change; or if it fostered new actions to bridge anti-corruption and conservation work for any of the individuals or the team, the situation analysis has been successful.

Part II: A look into real examples of corruption-oriented situation analysis

This section will describe three case studies of how teams implemented a corruption situation analysis for a conservation activity.

» **Case Study #1** comes from a Latin American country with a large fishing sector in which many operations remain informal.

» **Case Study #2** comes from an Asian country heavily reliant on sustainable community forestry, where local governance has reported long-standing success.

» **Case Study #3** comes from a European country where, despite having a stable government and enhanced legal frameworks, many development projects are granted without public input or adequate public oversight.

These case studies are not intended to be complete methodologies to be "copied and pasted." However, they are useful points of departure for teams who may be looking for how to get started.

1. Case Study #1: Latin America

A. Purpose

Through their previous fisheries work, the local team had identified challenges with the process for obtaining *departure permits* for small-scale/artisanal fishers. This permit is required in this country for a vessel to engage in fishing activities and must be requested in person. To grant the paper-based permit, the competent authority requires information on both the vessel and the crew. However, many small fishing vessels sailed without obtaining the required permit, and there were rumors about paying bribes to avoid sanctions for not having it.

The team was already working on digital innovations for transparency and traceability for fisheries. Hence, their situation analysis aimed to understand

if digital tools would effectively increase usage of the departure permits and help close any corruption or other vulnerabilities associated with a paper-based process. Accordingly, the situation analysis sought to understand (i) the process of obtaining the permit, (ii) the corruption vulnerabilities associated with obtaining it, and (iii) why fishermen in the area of study were not requesting the permits.

B. Approach and implementation

Although the local team described their approach as a "vulnerability assessment," their approach and methodology was essentially a corruption risk assessment. The team reviewed literature and mapped the legal process to obtain the permit. They then identified the vulnerabilities in the process through interviews and surveys with vessel owners and managers, government officials from the authority that issues the permits, along with fisher personnel in charge of logistics or obtaining permits.

The team used a snowballing sampling technique; they identified a few key initial stakeholders from past projects and ongoing collaborations who were then able to recommend other potential interviewees. Each interview and survey took place in person, and participants were provided with an informed consent form that stated the confidentiality of the discussions. Those forms were signed to indicate their binding nature, which was key in providing the stakeholders the confidence to engage in conversations (about such sensitive topics) with the researchers. The researchers also fully complied with the legal requirements for protecting the personal data they collected.

In addition to building trust via the confidentiality/consent forms, the team also identified that the language they used when discussing sensitive topics such as corruption needed to be adjusted to the specific participant. For instance, some stakeholders readily and openly talked about "corruption," particularly in obtaining departure permits. Openly discussing "corruption" with some of the other

stakeholders, however, could have hindered their work and the team's ability to implement certain project activities. Instead, the team used terms like "vulnerabilities" in the process.

Upon reaching saturation (when no new information was being collected), the team analyzed the information to map the vulnerabilities linked to the legal process of obtaining the permits.

Once those vulnerabilities had been identified, as reflected in **Table 1**, the team assessed the impact and probability of occurrence for each (see **Figure 2**). There are multiple frameworks for assessing the impact and probability of occurrence of corruption

risks; see some examples here, here, and here. However, this task almost always entails a subjective decision to establish the assessment criteria (e.g., it is "highly likely" to occur if it has happened five times in the past five years, but it is just "likely" to occur if it has happened one to three times in the past five years) and when making the assessment itself. For example, assessing if a specific corruption risk in granting an artisanal mining permit should be considered catastrophic, grave, or moderate necessarily implies a subjective decision from the researchers who rely on their expert judgment of the perceived impacts of that risk.

Table 1. Examples from vulnerability map

N°	Task	Vulnerability	Responsible
6	Commute to the public authority for obtaining the departure permit	The distance, the time required for obtaining the permit, and/or the opening times of the public authority limit the access to this service and incentivize payment of bribes, in money or in kind, to avoid getting sanctioned for not having the permit.	Vessel owner
8	Gathering the required documents	Given that this is an informal sector, some vessel owners, vessel crew, and/or vessels lack some of the required documents, or they have documents that have expired.	Vessel owner
10	Receiving the forms and required documents	The human interaction with staff allows bribes, either offered by the person obtaining the permit or requested by the government officials. Bribes are offered or requested in money or in kind.	Authority who grants the permit
15	Vessel departure	The vessel may depart with additional non-declared crew members or different to the ones declared to the authority.	Vessel owner
22	General	Stakeholders lack awareness of the legal means to report irregularities.	Vessel owner

Figure 2. Assessment of impact and probability of occurrence

6. The distance the time required for obtaining the permit and/or the opening times of the public authority limit the access to this service and incentivize the payment of bribes, in money or in kind, to avoid getting sanctioned for not having the permit.		
	Score	**Argument & Source**
Probability of occurrence	3	According to surveys, more than 60% of the users considered the time required to obtain the permit to be "excessive" (more than 30 minutes)
Impact	4	According to surveys, 65% pay in money or in kind to avoid being sanctioned. Due to the long time required to obtain the permit, stakeholders often decide to sail without a cast-off permit. This entails the risk of being sanctioned or facing severe weather conditions at sea. It also entails the risk of being audited and deciding to pay bribes to avoid sanctions.
Risk	12	High
Consequences		Bribes and additional money expenses for the vessel owner for not having the permit.

| 8. Given that this is an informal sector, some vessel owners, crew, and/or vessels lack some of the required documents or those documents have expired.		
	Score	**Argument & Source**
Probability of occurrence	4	According to surveys, 83% do not have the required vessel ledger. According to surveys, 89% of the cases of permit denial is due to not fulfilling the documentation requirements, mainly not having crew documents.
Impact	4	Given the informality of the sector and the lengthy process to obtain all permits, stakeholders prefer to depart without a permit. This entails the risk of being sanctioned or facing severe weather conditions at sea. It also entails the risk of being audited and deciding to pay bribes to avoid sanctions.
Risk	16	High
Consequences		Decreased legitimacy for the competent authority, incentives to remain informal and additional costs for the vessel owner.

10. The human interaction with staff allows bribes, either offered by the person obtaining the permit or requested by the government officials. Bribes are offered or requested in money or in kind.

	Score	Argument & Source
Probability of occurrence	3	According to surveys, 58% of the stakeholders pay bribes to obtain the permit. According to interviews, the stakeholders have to "negotiate" with the government officials in charge of verifying the requirements for the permit.
Impact	4	According to surveys, 63% know about corruption cases related to obtaining a permit. Literature reports cases of government officials involved in irregularities related to fishing. Public complaints have been levied against public auditor and government officials for asking for bribes.
Risk	12	High
Consequences		Bribes, informality, and government officials arrested for possible acts of corruption.

15. The vessel may depart with additional non-declared crew members or different ones than were declared to the authority.

	Score	Argument & Source
Probability of occurrence	4	According to surveys, 82% do not have all the required documents to obtain a permit, and 78% only had a few. Literature reports that the persons who actually engage in fishing are not declared since they don't have the required documents.
Impact	4	This practice is a felony and can also foster bribes to avoid criminal referral to the competent authority.
Risk	16	High
Consequences		Incentives to not register the real crew, deficiencies in the work of the competent authority.

In this particular case, the local team relied on previous Transparency International work on mining (see an example here) to draw insights on how to assess the impacts and probability of occurrence. However, in the end, the assessment relied on the judgment of the local team and the consultants, who were highly skilled and familiar with fisheries

work. The team used a 1 to 4 scoring system, where 1 was the lowest and 4 was the highest severity / probability. The results of these individual assessments were then multiplied to obtain the level of risk, categorized as low, mid-low, mid-high, and high (see **Figure 3**).

Figure 3. Heat map

Legend:
- Low 20%
- Mid-Low 40%
- Mid-High 60%
- High >80%
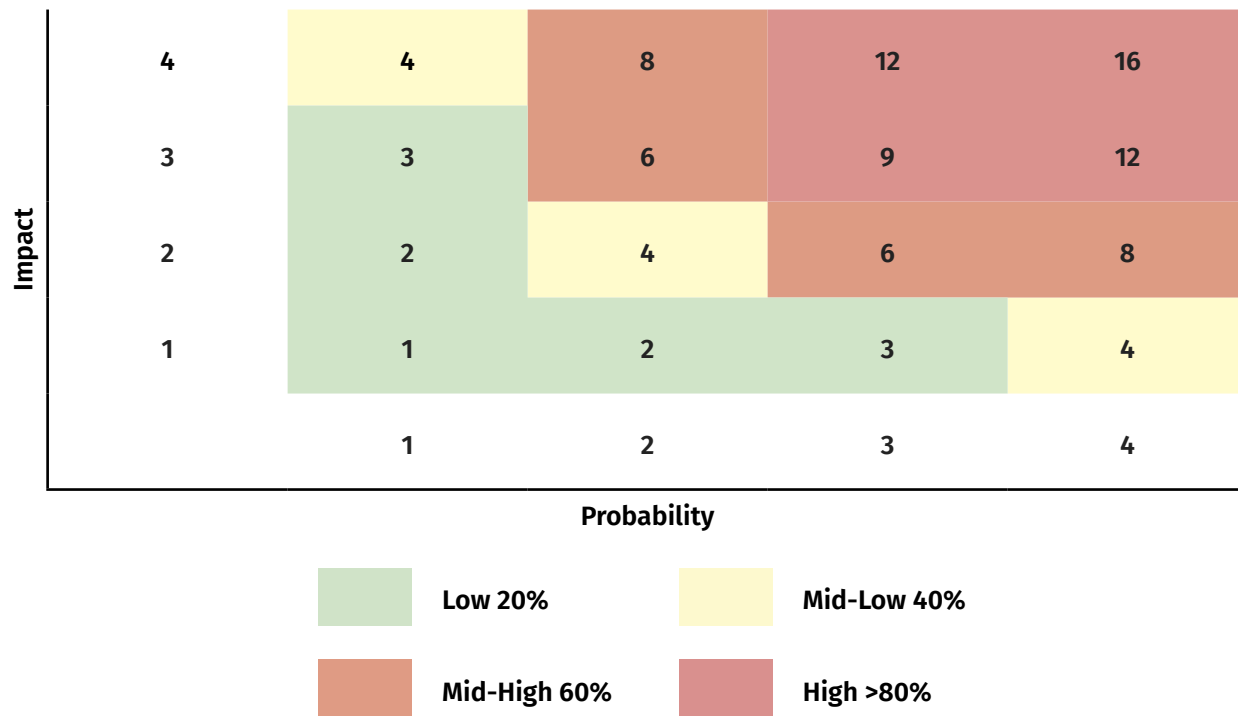
Lastly, the team combined this information into a matrix (see Figure 4) that identified the stage of the process of obtaining the cast-off permit, the vulnerability, its probability of occurrence and impact, and its degree of risk. This matrix allowed the team to formulate their recommendations to target the higher-level risks.

Figure 4. Risk matrix

Vulnerability code	Stage	Vulnerability description	Probability	Impact	Level of risk
6	Permit request	The distance, the time required for obtaining the permit and/or the opening times of the public authority limit the access to this service and incentivizes the payment of bribes, in money or in kind, to avoid getting sanctioned for not having the permit.	3	4	12
8	Permit request	Given that this is an informal sector, vessel owners, crew, and/or vessels lack some of the required documents or those documents have expired.	4	4	16
10	Document filing and verification	The human interaction with staff allows bribes, either offered by the person obtaining the permit or requested by the government officials. Bribes are offered or requested in money or in kind.	3	4	12
15	Authorization	The vessel may cast off with additional non-declared crew members or different ones than were declared to the authority.	4	4	16
22	General	Lack of awareness of the legal means to report irregularities	3	4	12

C. Results and recommendations

Assumptions and pre-determined scope of analysis

The research confirmed many of the local team's initial assumptions about corruption risks, such as the payment of bribes when fishermen do not obtain the departure permit and their boat is inspected at sea or landing. Results from the situation analysis also substantiated the real need for a digital tool to get the permits, which could reduce risks by reducing human interactions and standardizing the process.

At the end of the analysis the local team did recognize a limitation to their work, in that the scope of analysis was limited to one geographical region. While the study was conducted in one of the main fishing regions, lack of resources meant that other important fishing regions in the country were not covered. Thus, the problems fishers face in those regions are not entirely known. The team realized that it would have been helpful to at least pilot and validate the interview and survey questions with a few stakeholders from the regions not covered by the analysis to unveil other potential issues, thus strengthening their questionnaires and surveys.

New findings: lack of standardized process and education-based regulatory barriers

At the same time, the local team did identify new aspects of the problem that were not part of their initial assumptions. For example, they recognized that although there is an established legal process for obtaining the permits, some local authorities were used to requesting additional requirements beyond those set forth in law. This lack of a standardized process incentivized boat owners and fishers to use intermediaries who knew how to navigate the system (e.g., knew someone at the local office that facilitated the issuance, or could duplicate or falsify documents). As a consequence, certain irregularities were prevalent. For example, a fisher could be reported as fishing on two faraway shores at the same time.

Another significant new finding involved barriers for fishers to be registered as such before the competent authorities. Registration requires that fishers completed their basic education (elementary and high school), and very few have accomplished that milestone. This created a regulatory barrier to formality for those fishers and therefore a vulnerability in the entire small-scale/artisanal fishing sector. In response to this finding, the local team has promoted the inclusion of education and formalization of fishers in other projects as a crucial strategy to tackle corruption vulnerabilities and accomplish their NRM goals.

D. Thinking of using this approach? Here's what we recommend:

Document the criteria for each level of impact and probability. For example, explaining what circumstances were used to determine that an impact should be qualified as 4 instead of 3 can make the analysis more systematic and improve analytic discussions.

Be sure to include analysis of the environmental impacts of the bureaucratic processes and vulnerabilities for corruption. This will incentivize target stakeholders to care about the findings and improve the monitoring and evaluation of programs that utilize the resulting recommendations.

2. Case Study #2: Asia

A. Purpose

Community forestry is of major importance for this case country, with multiple local communities in charge of the sustainable use of forests. Yet, despite a robust legal framework and support from a wide array of stakeholders, the local team knew that some communities had not been able to implement and maintain good governance. For example, the team had witnessed that financial resources that by law should have been invested in favor of the poor, women, traditionally marginalized groups, and Indigenous Peoples were not reaching their destination.

This circumstance implied that, in some local communities, there was a need to strengthen governance mechanisms such as accountability, gender equality, equitable sharing of benefits, and social inclusiveness. Thus, the team's situation analysis aimed to identify the specific governance deficiencies in the target local communities to inform the team's capacity building efforts.

B. Approach and implementation

The local team implemented their assessment via:

1. Literature review on governance mechanisms of community forestry,

2. Policy and legal analysis, and

3. Qualitative research.

The **literature reviewed** was mainly journal articles and assessments on community forestry governance. The **legal analysis** and mapping of the applicable legal provisions included national laws, policy documents, draft bills, and the six communities' constitutions and forestry operational plans. The **qualitative research** included discussions, focus groups, and interviews with both executive members, as duty bearers in charge of managing the community forests, as well as general members, as right holders in the community forestry scheme.

To analyze the collected information, the team first identified the governance principles to be assessed (e.g., transparency, participation, accountability, rule of law). From those general governance principles, the team identified a set of indicators that would help understand each local community's governance performance in managing their forest. Then, via participatory methods, the team evaluated governance performance via a simple "traffic light" approach, scoring each indicator for that community as either green, yellow or red. A green assessment indicated good performance on the indicator, yellow represented some positive actions to achieve the indicator, and red represented a major gap or problem. **Figure 5** contains an excerpted example of the assessment for one of the six selected local communities.

Figure 5. Governance assessment of a single local community

Assessment criteria	Indicators	Key gaps	Overall governance performance	Remarks
Rule of law	Constitution and operational plans (OP) are revised and updated regularly		🟩	
	The local community forestry committee (CFC) performs in accordance with laws and regulations	Doing good but the members agree that they can do better	🟨	
	Evaluation/assessment of the policies/objectives of CF management	Not done	🟥	
	CF objectives consistent with prevailing forest policies		🟩	
	Annual General Assembly (GA)		🟩	
Transparency	Public hearing and public auditing at least once a year		🟩	
	System of internal and external financial audit		🟩	
	Up to date documentation of income/expenditure, and account management follows double entry bookkeeping	CFC realizes, but not systematic and updated and no double entry bookkeeping	🟥	
	Free access to information regarding decisions, funds, and so forth; stakeholders know about decisions made		🟩	
	Complaints of corruption	No	🟩	
Accountability	Executive committee have clearly defined roles responsibilities and act accordingly		🟩	
	Mechanism and availability of information for consultation/involvement and feedback		🟨	
	Implementation of commitments made during public hearing/public auditing		🟩	

Participation	Attendance of users in meeting of OP/constitution preparation/renewal		🟩	
	Users feel free to voice their views at general assembly		🟩	
	Poor, women, ethnic minority voices considered while making decision		🟩	
Responsiveness	Participatory and transparent monitoring system		🟩	
	Implemented social security and community development activities	Implemented community development activities but limited attention on security	🟨	
Inclusion and equity	Well-being ranking revised in every two years	Wellbeing ranking not updated and benefit sharing is not in accordance with it	🟥	
	Specific schemes and provisions for poorest/marginalized people		🟥	Except the loan disbursed earlier
	Representation of female, marginalized, and poor members on CFC is according to rules and regulations		🟨	
Efficiency and Effectiveness	Methods of the forest operations carried out regularly, e.g., fire line construction		🟨	
	Forest management activities are carried out in line with OP		🟨	
	Functional coordination with other stakeholders (local government, other CFs, agencies)	Was earlier but now declining	🟨	
Consensus	Decisions are made based on consensus		🟩	
	The process of consensus is participatory and institutional		🟨	
	The representatives and leadership positions are chosen in consensus		🟨	Sometimes not in consensus

Upon completing the assessment of each community, the local team compiled the results of the different governance principles (see **Figure 6**) and selected five main gaps for capacity building for each community.

Local community forestry management						
Governance principles	Community #1	Community #2	Community #3	Community #4	Community #5	Community #6
Rule of law	green	yellow	red	yellow	green	green
Transparency	green	green	yellow	green	green	green
Accountability	yellow	yellow	red	yellow	green	green
Participation	green	green	green	green	green	green
Responsiveness	green	yellow	red	yellow	yellow	green
Inclusion & equity	yellow	yellow	yellow	yellow	yellow	yellow
Efficiency & effectiveness	red	red	red	yellow	yellow	yellow
Consensus	yellow	yellow	red	green	green	green

C. Results and recommendations

Scope of analysis: Strengthening good governance

The study did not focus on explicitly identifying evidence of corruption. The team understood that a good deal more trust-building was necessary before attempting to conduct data collection on such a sensitive topic. Instead, the local team focused on understanding if the governance mechanisms were working properly. Since good governance mechanisms were believed to mitigate corruption risks, improvements in those governance mechanisms could serve as a proxy for reduced opportunity for corruption.

Indeed, the local team was able to pinpoint specific governance mechanisms that needed reinforcement in their trainings and workshops. As a response to these trainings, the local team witnessed specific improvements providing preliminary evidence that opportunities for corruption will be ultimately reduced. For example:

» One community decided to replace the chairperson managing community forestry after realizing during the training that certain financial resources were not accounted for properly.

» Following workshops with the TNRC team, someone from a trained community alerted the local authorities about possible misuse of funds from the sale of timber, and the authorities began investigating the case.

» Other communities gained knowledge on legal requirements like previous consultation with Indigenous groups and the need to keep records of timber sale transactions, both of which can reduce corruption opportunities.

This case illustrates well a critical question for any corruption situation analysis: is a problem we're seeing corruption, or is it simply lack of capacity or weak implementation of processes? Because the team did not assess acts of corruption, they cannot conclude corruption has been reduced. But improvements in less sensitive, more accessible issues such as financial management do provide reasonable evidence that the *opportunities* for corruption have been reduced. The work also builds trust so that the team can reassess in the future if working directly on the issue is necessary and more feasible.

Key stakeholders in driving change, working on corruption

An important lesson learned from implementing the situation analysis was the identification of which stakeholders were unwilling to engage in corruption work and those that did want to engage. In this case, the partner organization that worked alongside the local team was reluctant, as they considered that their institutional mandate could conflict with anti-corruption work. Even some team members were reluctant to engage at the beginning of the study. They considered it challenging to work on corruption, because corruption is everywhere but cannot necessarily be pinpointed. They also felt that corruption has become socially accepted, making it riskier to expose corruption.

Despite these initial concerns, the team successfully engaged in the analysis and felt empowered to transfer this type of work to other areas of their programming. The team also realized that corruption can be discussed and now feel comfortable discussing it. Even though corruption could not be openly discussed with specific stakeholders, requiring proxy indicators and terms such as "transparency" and "vulnerabilities," the team did discover that others were more willing to talk about it. Specifically, the local team found that youth are very keen to engage in anti-corruption work. The team therefore developed new activities to organize and support youth (e.g., schoolteachers and students) to hold the management of community forestry accountable.

D. Thinking of using this approach? Here are some recommendations.

To better standardize the analysis and comparison of cases, future practitioners could consider establishing more objective criteria for scoring indicators green, yellow, and red. For example, the indicator of "*users feel free to voice their views at general assembly*" could use brackets for respondents: fewer than 40 percent of respondents agreed, 40-80 percent agreed, over 80 percent

of respondents agreed. For the occurrence of accountability mechanisms, public participation, or third-party audits, the scoring could be based on frequency: once a year, every 6 months, or available all year round.

Like the previous case, the analysis can also be complemented by including more references to the environmental impacts of corruption or poor governance mechanisms. While some of these impacts can be inferred, an explicit description of the problem can help raise awareness of the importance of governance mechanisms with other stakeholders. It can also help with project monitoring and evaluation.

Lastly, this analysis was primarily conducted through virtual means. The team reported that not being able to go to the local communities in person may have limited their findings. In-person data collection would also facilitate outreach to additional stakeholders, like the private sector. Including the private sector in the analysis could have contributed information on how the local community forestry operations are conceived and work. For example, independent contractors are usually hired to draft the incorporating documents and obtain all the required permits and approvals; they could have provided information on the issues generally raised by executives at this stage. Similarly, including timber buyers could have offered additional layers of information on how negotiations and timber sales are managed (e.g., if there are any non-registered payments), which was one of the main concerns for this particular case.

3. Case Study #3: Europe

A. Purpose

Although this country has set environmental targets for increasing the number and size of protected areas in the past couple of years, achievement of these targets has been delayed. In parallel, it has experienced a considerable increase in infrastructure projects, often approved in violation of environmental policies. The local team, through their previous conservation work, were able to identify that a determining factor in facilitating these infrastructure projects, and the environmental impacts they often entailed, was the spatial planning process. Spatial planning processes cover large areas where it is later possible to develop specific individual projects that can generate environmental impacts.

The team also identified that there was little citizen oversight of the spatial planning process. This situation implied that citizens were often aware of the approved land use only once the spatial planning process had concluded, making it more challenging to prevent environmental damage. Furthermore, a lack of citizen oversight, especially in infrastructure projects involving large amounts of money and equally large potential impacts, is a major risk for corruption. Hence, the local team decided to focus their pilot on this topic. They determined that they needed a situation analysis as a first step, to thoroughly comprehend the legal process for spatial planning and to identify stages at which public participation could be promoted.

B. Approach and implementation

The main approach used for this case was a legal framework analysis (similar to an institutional analysis), complemented by public and key stakeholder consultations. The legal framework analysis **mapped the legal process for creating and adopting spatial and urban plans**. The situation analysis also aimed to **understand the power relations among the decision-makers** and, d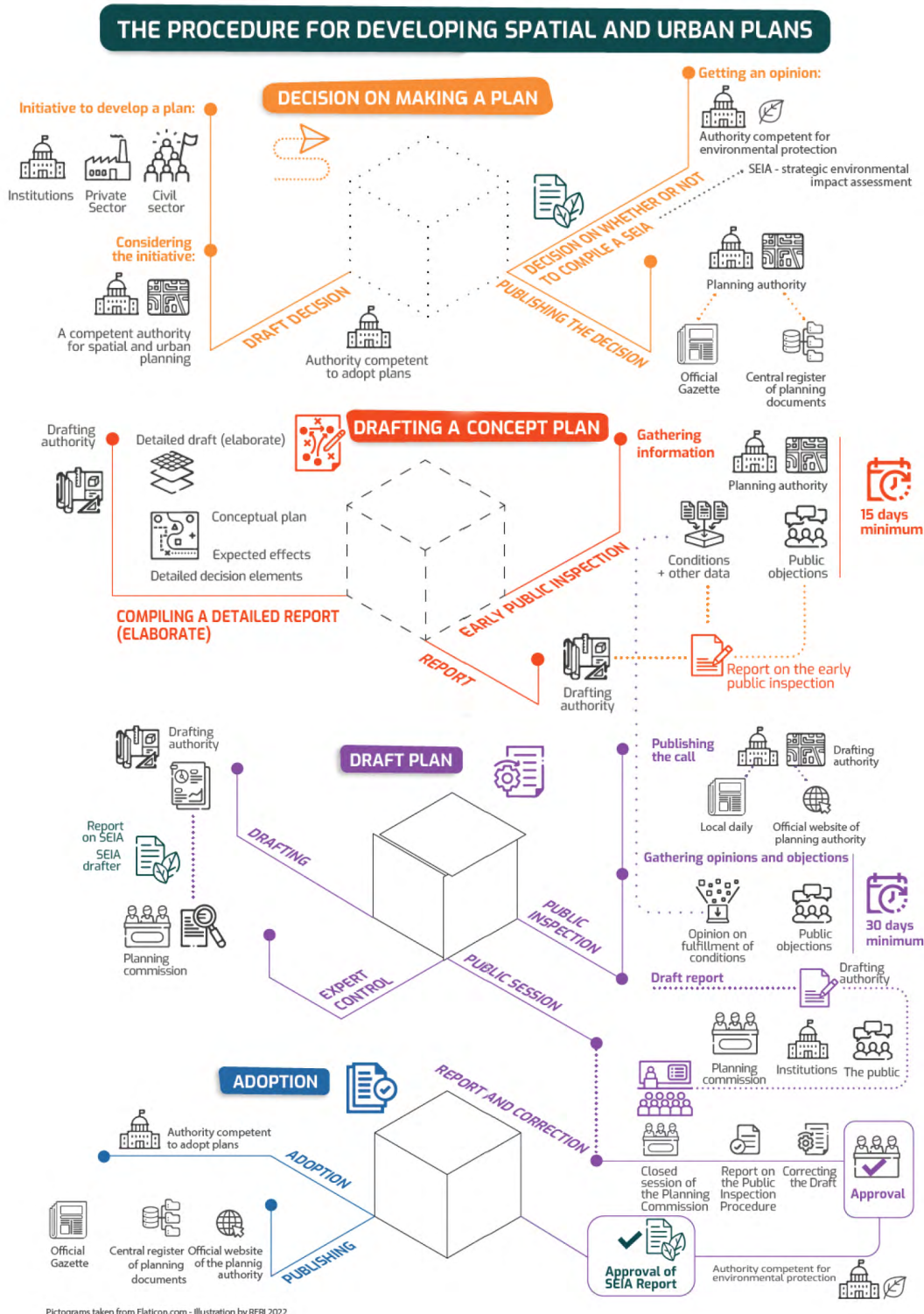ifferent from the previous two analyses, **identify concrete examples of irregularities in spatial planning**. Understanding the power relations was critical in identifying any corruption risks, as the team suspected that powerful individuals could influence spatial planning processes to obtain personal benefits.

The team partnered with a consultant organization with significant environmental and legal expertise. For the legal analysis, the consultant reviewed various legal provisions and international treaties and mapped the process and stakeholders involved in adopting spatial and urban plans at the national, regional, and local level (see Map 1). At each stage of the process, the consultant identified any weaknesses or contradictions, like the corruption risk associated with the discretionary powers of some public officers. In specific circumstances, these officers can overrule environmental protection provisions to approve plans for projects of "strategic importance to the country" (e.g., highways), which represents a risk for corruption (e.g., influence peddling).

Upon completing the legal analysis, the consultant sampled ten protected areas to record any critical problems or illegalities threatening their fundamental environmental value and legal status. The consultant indeed found some irregularities, and targeted four specific cases where they could intervene with the administrative authorities to try and stop further environmental damage. Similarly, the local team held an open call on social media for corruption cases associated with spatial planning. This open call asked people to report corruption in their local communities, and these reports were then transferred to the consultant organization for them to take legal action.

Map 1. Legal process for spatial and urban plans

THE PROCEDURE FOR DEVELOPING SPATIAL AND URBAN PLANS

Pictograms taken from Flaticon.com - Illustration by RERI 2022

In addition, the local team hosted a kick-off meeting with other large organizations highly skilled in spatial planning. In this meeting, they discussed the legal analysis and scope of the overall project, debated missing topics and how corruption should be approached, and offered suggestions to focus the local team's research. The local team found this meeting essential for validating their findings and preparing for the second stage of the project, which included training and stakeholder identification workshops with smaller local organizations.

C. Results and recommendations

Scope of analysis: Legal mapping and barriers to citizen oversight

The local team reported that their main goal, understanding the legal process required for adopting spatial and urban plans, was achieved. However, the goal of identifying the power relations of the decision-makers involved in spatial planning was only partially achieved, given the high degree of centralization of the decisions. Having these decisions occur at high levels of government (e.g., at ministerial levels) poses an additional barrier for smaller organizations or individual citizens to participate in the spatial planning process.

Through their efforts, the local team was able to identify other difficulties in the spatial planning process related to citizen oversight and access to public information. In one case, tourist facilities and infrastructure projects conflicted with a soon-to-be-declared national park, but the local team was the only civil society organization presenting objections. In another case, the team had to overcome several barriers to accessing information on a pending plan that, according to law, should have been publicly available. Once the team had secured all the required documents, they only had one day left to present their objections. Such circumstances make it almost impossible for smaller, less specialized organizations to participate in these processes actively and effectively.

Productive findings: Need for a systematic approach, creation of new connections

The analysis identified new needs and avenues of work that the team had not considered at the beginning of the study. One of the most important results was the need for a systematic approach to corruption and spatial planning. The team now take a systematic, "preventive" perspective to protecting protected areas; they now participate in spatial planning processes to prevent environmental damage from occurring, rather than having to react and contest plans or projects after they are approved.

As another example, the team realized the need to build relationships with and between government officials willing to comply with their duty to share public information on spatial plans. Since then, the local team has been able to identify some of those government champions of openness that could help civil society organizations navigate this very complex legal process. The team similarly concluded that public participation in spatial planning is so complex that a single civil society organization would find it difficult to challenge the processes. Therefore, they identified the need for a group of experts and allied entities willing to collaborate in this kind of endeavor and incorporated the systematic approach to their coordination of this group.

Knowledge transfer

The partnership with the expert consulting organization resulted in significant knowledge transfer to the local team. The team feels more comfortable navigating the spatial planning legal process and being able to identify key intervention points. They are also able to better identify the type of support needed from other organizations (e.g., legal counsel) to actively participate in consultations on spatial planning that could negatively affect protected areas.

Beyond the local team, another crucial result from this study is the resulting guide for local organizations. The guide enables these other organizations to participate in spatial planning processes even if they are not experts and do not know all the legal technicalities. This valuable report provides both technical guidance (e.g., how to contest administrative decisions) and tactical guidance (e.g., remain objective and non-confrontational).

Dynamic recommendations

Given the staged approach to this analysis, recommendations were developed at different points in the process. The legal analysis generated some initial recommendations that were later refined, adjusted, or improved during the kick-off meeting and trainings.

Yet the main highlight from this case is how the situation analysis has become a sort of living body, where the local team constantly interacts with other stakeholders to improve citizen participation in spatial planning and close the gaps for corruption. As a result of this dynamic, the TNRC team does not have an exhaustive, fixed list of recommendations. Instead, they have identified issues that need to be addressed and are progressively finding new avenues to work on those with the help of their newly acquired partners.

D. Thinking of using this approach? Here's what we recommend:

The local team very accurately identified that not interviewing government officials left a significant gap in their analysis. These interviews were not included in part due to the difficulty of obtaining formal interviews, but the local team reported that even informal interviews would have been helpful to understand the officials' perspectives on the spatial planning problem. These interviews could have also been beneficial in triangulating the accuracy of the local team's assessment and mitigating any biases. Engaging government officials early, when possible, also increases the chances of long term buy-in for the work.

Although the team made some progress in understanding the power relations between decision-makers, the team did recognize that lacking a more thorough understanding of these relationships was a gap. This could have been somewhat mitigated by including interviews with a broader scope of stakeholders (e.g., scholars, private sector, lawyers) and by including this specific topic as part of the validation meetings and trainings.